

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

v.

OSAKPAMWAM HENRY
OMORUYI, OSARETIN
GODSPOWER OMORUYI,

Defendants.

Case No. 21-cr-10217-DPW-DHH

**ASSENTED TO JOINT DEFENSE MOTION TO CONTINUE FINAL
STATUS CONFERENCE FOR 60 DAYS**

NOW COME the defendants, through counsel, and respectfully move this Honorable Court to continue the Final Status Conference scheduled for May 26, 2022, for a period of 60 days. In support thereof, counsel state the following:

1. The Government has produced voluminous discovery in the amount of 225GB (including hundreds of thousands of pages & images of cell phones).
2. The Court previously granted a defense motion to deem this case “complex” pursuant to 18 U.S.C. § 3161(h)(7)(B)(ii) based upon the hundreds of thousands of pages of discovery and hundreds of collective attorney hours to be spent reviewing discovery. (The Court granted that request at ECF # 81 at 1–2).
3. Successor counsel for defendant Osaretin Omoruyi was appointed approximately three months ago and has not completed his review of all of the discovery. (ECF# 79).

4. Successor counsel of Henry Omoruyi was appointed on August 2, 2021, and continues to conduct generalized searches and analysis of the discovery.

5. Due to Attorney Tzeng's recent appointment and ongoing review of discovery, the undersigned counsel have not been able to meet to determine whether there are any potential joint defenses or severance issues which must be raised.

6. At this time, the defendants, particularly counsel for defendant Osaretin Omoruyi, are requesting a 60-day continuance of the final status conference to continue to review discovery with their clients, explore a potential resolution of this matter, and prepare pre-trial motions, before the case is returned to the district court.

7. The government through its representative AUSA Ian Stearns has assented to this request.

WHEREFORE, based upon the foregoing arguments and authorities this Honorable Court is respectfully urged to continue the Final Status Conference for 60 days.

Respectfully submitted,

OSAKPAMWAM HENRY OMORUYI
By his attorney,

By: /s/ Peter Charles Horstmann
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RULE 7.1 CERTIFICATION

I hereby certify that I have conferred with counsel for the government, and that the parties agree to the relief requested in this joint status report.

CERTIFICATE OF SERVICE

I, Peter Charles Horstmann, hereby certify that on May 18th, 2022, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Peter Horstmann
Peter Horstmann